

CITY MANAGER'S OFFICE

Gary A. Huff - City Manager
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November 19, 2012

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910
Phone: (301) 589-5318

Re: Application/Proposal
\$400,000 USEPA Assessment Grant - Hazardous Substances and Petroleum Products
City of Piqua, Ohio

Dear Mr. West:

Piqua, Ohio is submitting the enclosed application for the community-wide hazardous substance assessment grant in the amount of \$400,000 (hazardous substances - \$200,000 and petroleum products - \$200,000).

Piqua, Ohio (the City), located approximately 25 miles north of Dayton, was a booming industrial town from the late 1800s through the 1900s. Manufacturers of apparel and textiles, hearses and ambulances, and aviation equipment established flourishing businesses, bringing a diverse work force and middle-class life to City residents. Brownfields are the legacy of this industrialization. The City has identified redevelopment of brownfields as a key component to economic recovery and future growth. Piqua is using its Comprehensive Plan to guide their brownfields redevelopment approach. Plan objectives echo community needs identified by residents during numerous outreach sessions: improve land use management; upgrade and/or provide necessary infrastructure; promote commercial and industrial redevelopment in ways that provide a fiscal benefit; continue to improve the City's riverbanks; and continue to create parks along the Great Miami River that will connect nearby neighborhoods, the existing Lock Nine Park and Linear Park, and nearby schools.

The Comprehensive Plan identifies 20 Areas on which to focus redevelopment. The City is currently focusing on 2 of the 20 Areas, the 26-acre Riverfront District, which contains numerous brownfields and adjoins the Clark Avenue Industrial District (which includes the impoverished Southview Neighborhood). These areas were chosen because of the number of "shovel ready" sites and/or location of sites in relation to desired park space along the Great Miami River. The Assessment Grant will support a key step in reaching these goals, which is the assessment of brownfields in the 26-acre Riverfront District, our struggling neighborhoods, and the Great Miami River watershed, which are negatively impacting the health and welfare of sensitive populations, the environment, and the City's economy.

Piqua has identified two health and welfare concerns related to brownfields. The first is the concentration of brownfield sites located near low-income neighborhoods, especially in the Riverfront Mill District, and the south-adjoining Southview neighborhood. The second

environmental concern is the migration of contaminants from brownfields to the Great Miami River.

The City's primary financial concern is the lack of quality employment opportunities, which is disproportionately impacting impoverished Piqua residents. Piqua's median household income is approximately 28% lower than Miami County's and approximately 23% lower than the State of Ohio's. In the past four years, over 250 manufacturing jobs were lost as Evenflo, Hartzell Propeller, and Jackson Tube Service dramatically reduced their Piqua operations. The neighborhoods in which the priority brownfields are located have the highest number of sensitive populations and highest poverty rates in Miami County.

Piqua recently received one of only six Ohio Department of Development (ODOD) Brownfield Action Plan Program grants and a \$148,000 grant from the US Center for Disease Control (CDC) to develop a community health and site reuse plan that will improve public health through redevelopment of brownfields along the Great Miami River corridor, with emphasis on the Riverfront District and adjoining Southview neighborhood. Piqua will leverage this state and federal grant funding to directly benefit assessment, cleanup, and redevelopment efforts in the targeted areas as well as throughout the City.

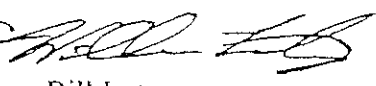
The following applicant information was requested as part of the Grant Application:

- a. Applicant Identification: City of Piqua, 201 West Water Street, Piqua, OH 45356
- b. DUNS number: 077430114
- c. Funding Requested:
 - i. Grant Type: Community-wide Assessment
 - ii. Amount: \$400,000
 - iii. Contamination: Hazardous Substance - \$200,000; Petroleum - \$200,000
 - iv. Community-wide
- d. Location: Piqua, Miami County, Ohio
- e. Application is not site-specific
- f. Contacts:

<u>Project Director</u> : Mr. Bill Lutz Development Program Manager 201 West Water Street Piqua, Ohio 45356 (937) 778-2062 email: blutz@piquaoh.org	<u>Chief Executive</u> : Mr. Gary A. Huff City Manager 201 West Water Street Piqua, Ohio 45356 (937) 778-2061 email: ghuff@piquaoh.org
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- g. Date Submitted: November 19, 2012
- h. Project Period: Three years from the date of the cooperative agreement
- i. Population: 20,522 (2010 census)

Sincerely,


Gary A. Huff
City Manager


Bill Lutz
Development Program Manager

Distribution: Ms. Deborah Orr, U.S. EPA Region 5

RANKING CRITERIA FOR ASSESSMENT GRANTS

1. Community Need

Piqua, Ohio (the City), located approximately 25 miles north of Dayton, was a booming industrial town from the late 1800s through the 1900s. Manufacturers of apparel and textiles, hearses and ambulances, and aviation equipment established flourishing businesses, bringing a diverse work force and middle-class life to City residents. Brownfields are the legacy of this industrialization; the City wants to expand their existing brownfields redevelopment program to address this legacy. The City has identified redevelopment of brownfields as a key component to economic recovery and future growth. Piqua is using its Comprehensive Plan, known as Plan It Piqua, to guide their brownfields redevelopment approach. Plan It Piqua's objectives echo community needs identified by residents during numerous outreach sessions: improve land use management; upgrade and/or provide necessary infrastructure; promote commercial and industrial redevelopment in ways that provide a fiscal benefit; continue to improve the City's riverbanks; and continue to create parks along the Great Miami River that will connect nearby neighborhoods, the existing Lock Nine Park and Linear Park, and nearby schools.

a. Health, Welfare, and Environment: The City has identified two health and welfare concerns related to brownfields. The first is the concentration of brownfield sites located near low-income neighborhoods, especially in the City's Riverfront District, along the Great Miami River, and the south-adjointing Southview neighborhood. During a reconnaissance of major roads, 30 more potential brownfields (automotive repair/sales, dry cleaners, machine shops, auto body shops, and manufacturing plants) were identified. Of these sites, approximately 80% are located near or within residential neighborhoods. The City has a preliminary inventory of brownfields and has identified priority sites to evaluate. These brownfields have impacted soil and groundwater with numerous contaminants, many of which pose health threats to nearby sensitive human populations and are likely migrating to the Great Miami River. Priority sites, along with potential contaminants and health effects are summarized in the following table:

Site / Neighborhood	Contaminants	Health Effects
Former Miller Meteor <i>Hearse and ambulance manufacturing</i> 5-acre site in Southview Neighborhood (Clark Avenue Industrial District)	Chlorinated solvents, acetone, toluene, petroleum fuels, asbestos, lead paint	Respiratory disease, central nervous system damage, heart disease, blood, liver / kidney damage
Former Automotive Garage and Repair Shop <i>Auto repair</i> 0.5-acre site in the Riverfront District	Chlorinated and petroleum solvents, asbestos, lead paint	Respiratory, central nervous system
Former Piqua Milling Co. <i>Grain and feed processing</i> City block in the Riverfront District	Chlorinated solvents, asbestos, mold	Respiratory disease, central nervous system
Former Piqua Power Plant <i>Electricity generation</i> 0.5-acre site in the Riverfront District	PCBs, asbestos, lead paint	Respiratory, central nervous system



Former Dry Cleaners Located between the Weaver's and Piqua Granit sites in the Riverfront District	Petroleum solvents, in particular perchlorethylene	Respiratory disease, central nervous system damage
Abandoned Gas Stations Located throughout City	Chlorinated and petroleum solvents, benzene, toluene, ethylbenzene, xylenes, lead, metals	Respiratory disease, central nervous system damage, cancer

These brownfields, located near or in residential neighborhoods, schools, and/or parks, negatively impact sensitive populations by potentially exposing them to numerous contaminants via direct contact, particulate ingestion, airborne particulates inhalation, and vapor intrusion pathways. Lung and bronchus cancer incidence rate (cases per 100,000 population per year) for Piqua (105.0) exceeds the rate for Miami County (60.6) the state of Ohio (75.0), and the U.S. (63.9) (*all cancer data from Ohio Cancer Incidence Surveillance System – 2008*). Asthma prevalence rates for Piqua are not available; Miami County rates have been estimated based on state and national rates and not on actual County data; therefore, asthma rates for sensitive populations in the County are not known. However, the Ohio Department of Health (ODH) compiles data for incidence of chronic lower respiratory diseases (formerly known as chronic obstructive pulmonary disease (COPD)). According to ODH published data for 2004 – 2006, 6.9% of deaths caused by chronic illnesses in Miami County were attributed to chronic lower respiratory diseases. This is in stark contrast to the rates for Ohio (5.7%) and the U.S. (5.3%).

The United States Environmental Protection Agency (EPA) AirData County Emissions Report for 2011 indicates that the large industrial plants in Piqua, area landfills, and vehicle traffic on State Route 36 have historically contributed millions of pounds of air pollutants. Now that many of these plants are closed and have become brownfields, emissions may be lower but residents living near these sources have already been exposed to numerous airborne contaminants and continue to be exposed to residual contaminants via airborne particulate inhalation, particulate ingestion, and vapor intrusion pathways. Compounding the effect of environmental pollutants are additional health concerns that are more prevalent in poor communities (Section 1.b). Based on the 2009 *National Health Interview Survey*, in the U.S., the percentage of obesity among lower income adults (30.7% for household income below \$35,000) are higher than that those of higher income (26.6%), demonstrating health disparities between income levels (*Vital and Health Statistics, Series 10, Number 249, December 2010*).

Health concerns for these sensitive populations are often intensified by lack of access to adequate health care and nutrition. In Piqua 16.5% of the population does not have health insurance, and for households with an annual income of less than \$25,000, the percent uninsured increases to 23.7% (*2009-2011 American Community Survey 3-year Estimates*). In addition, more than 65% of Piqua students received free or reduced lunches in the 2011-2012 school year (*Ohio Department of Education*). These numbers demonstrate the breadth of health concerns across Piqua's population.

Another health and environmental concern is the migration of contaminants from brownfields to the Great Miami River. The watershed is home to numerous flora and fauna, including the Endangered Indiana Bat and the Endangered Rayed Bean Clam (*US Fish and Wildlife Service, 2010*). These and many other sensitive species in the watershed's require protection from contaminated run-off and groundwater.

b. Financial Need: Piqua's economic success has long been tied to a manufacturing base that has slowly crumbled, triggering a loss of employment opportunities and money available for investment in the community. The City is facing an ever-tightening budget as property values



decline and local income tax revenues plummet. Piqua needs additional funding to continue assessing the brownfields that are contributing to the ongoing deterioration of neighborhoods, commercial zones, and industrial districts. Redevelopment of these sites will spur economic growth, provide impoverished residents with much needed employment opportunities, and increase the City's property and income tax base.

The City's primary financial concern is the lack of quality employment opportunities, which is disproportionately impacting impoverished Piqua residents. Piqua's median household income is approximately 28% lower than Miami County's and approximately 23% lower than the State of Ohio's (2009-2011 American Community Survey). From January 2008 to January 2010, Piqua's unemployment more than doubled from 6.3% to 13.1% (Home Facts). Unemployment has gradually improved, but economic statistics illustrate the difficulties for residents to find and keep good-paying manufacturing jobs. In the past four years, over 250 manufacturing jobs were lost as Evenflo, Hartzell Propeller, and Jackson Tube Service dramatically reduced their Piqua operations (Piqua Daily Call Newspaper). Simultaneously, other manufacturers and businesses in Piqua and Miami County also downsized. From 2003 to 2009, the number of manufacturing companies in Miami County decreased by 11.3%; over 30% of employees were laid off in the same time period (U.S. Census Bureau – County Business Patterns). Statistics comparing Piqua and its Southview Neighborhood to County, State, and National figures are presented below.

	Southview Neighborhood	Piqua	Miami County	Ohio	National
Population	2,523 ¹	20,522 ¹	101,397 ¹	11,536,504 ¹	308,745,538 ¹
Unemployment	NA	7.2% ⁴	7.4% ²	7.2% ²	7.8% ²
Poverty Rate	20.6% ³	16.7% ³	15.9% ³	16.4% ³	15.1% ³
Percent Minority	9.4% ¹	7.6% ¹	5.6% ¹	17.3% ¹	26.7% ¹
Median Household Income	\$25,528 ⁴	\$35,756 ³	\$49,564 ³	\$46,595 ³	\$49,445 ³

¹Data from 2010 U.S. Census - www.census.gov

²Data from Bureau of Labor Statistics - www.bls.gov

³Data from 2010 American Community Survey -

www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html

⁴Data from 2009 – 2011 American Community Survey -

www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html

NA – not available

The second component of Piqua's financial need is the decrease in available revenue. Local property taxes shrank 23% and general revenue from all sources shrank 20% from \$13.8 million in 2008 to \$11.1 million in 2010 (Piqua City Manager). Income tax, the City's largest general revenue contributor, is down almost \$400,000 (4.8%). This revenue reduction was primarily caused by a 25% decline in funding from the County and a 45% decline in funding from the State. Beginning in 2013, the State will eliminate the estate tax, which, on average, contributed \$627,500 annually to City revenue. Piqua implemented numerous cost-cutting measures to address the revenue reductions. Full-time staff have been reduced by 28 (13%), capital purchases have been delayed, and departments have been restructured. (All Piqua data from Piqua City Manager)

The Assessment Grant will help Piqua assess brownfields and jump-start redevelopment on sites that conventional developers might typically ignore. This, in turn, will promote the reuse of abandoned brownfields, provide good-paying jobs for City residents, and increase City revenues, all of which are key objectives in the Comprehensive Plan.



2. Project Description and Feasibility of Success

a. Project Description: Piqua's Comprehensive Plan has been recently updated to reflect the City's transition to a more targeted approach to planning and development activities. The City uses its Comprehensive Plan as a road map for a targeted approach to smart growth and creation of a truly livable community. Citizen driven, the Comprehensive Plan identifies 20 Areas on which to focus redevelopment. The City is currently focusing on 2 of the 20 Areas, the 26-acre Riverfront District, which contains numerous brownfields and adjoins the Clark Avenue Industrial District (which includes the impoverished Southview Neighborhood). These two areas were chosen because of the number of "shovel ready" sites and/or location of sites in relation to desired park space along the Great Miami River. The Assessment Grant will support a key step in reaching these goals, which is the assessment of brownfields in the 26-acre Riverfront District, our struggling neighborhoods, and the Great Miami River watershed, which are negatively impacting the health and welfare of sensitive populations, the environment, and the City's economy. Piqua is comprised of four major neighborhoods (Southview, Southwest, Shawnee, and North Park) and the Riverfront District. Piqua plans to use funds from the Assessment Grant along with recently awarded federal and state grant funds (2.b.iii) to redevelop commercial and residential areas along the riverfront. The intent of this approach is to create a transformative impact on areas in which other funding (e.g., CDBG funds) and other City resources are already concentrated. This approach will focus on assessing the unique needs of each neighborhood, building capacity and stability within the community, and fostering neighborhood involvement and support.

The Riverfront District encompasses three priority brownfields, the **Piqua Milling, Former Auto Garage and Repair, and Former Power Plant sites**. This District, a formerly vibrant and diverse commercial and industrial area near downtown Piqua, is now home to vacant and blighted buildings and the resulting underserved residents in the nearby Southview Neighborhood. The City plans to transform the District into a mixed use commercial/retail neighborhood and link the area to the nearby Downtown, as well as Lock Nine Park and Linear Park. Assessment Grant Funds will be used to complete Phase I and/or Phase II Environmental Site Assessments (ESAs) at the priority sites. Assessment data will be used to determine the nature and extent of contamination; evaluate exposure pathways; conduct cleanup planning to determine appropriate mitigation/remediation strategies that are protective of human health and the environment; and support redevelopment activities. These assessments will support commercial/industrial redevelopments in areas with existing infrastructure, creating local jobs and amenities.

As the grant project progresses, Piqua will also assess other priority sites and integrate high-risk and developable sites identified by community members and community organizations (Sections 2.b.ii, 3.a, and 3.c) into the project and utilize appropriate grant funds to assess these sites.

Piqua will create a Redevelopment Advisory Committee (RAC) to provide guidance and direction for the program, while also providing an opportunity to market brownfields, educate the community, and foster public participation. The RAC will meet at least quarterly and discuss program progress. RAC members will come from Neighborhood Associations, the Piqua Area Chamber of Commerce, Protecting Our Water Ways (POWW), and Grow Piqua Now (3.c). The City's Department of Development (DOD) will act as lead organization and will be responsible for day-to-day grant operations including: updating and maintaining the brownfields inventory; distributing information about the project to the community, seeking input and collaboration from the community; selecting sites for assessment; working with property owners; seeking out and working with potential end users; and tracking project progress. The City will also be responsible for procuring all contractual services, submittal of required reports to the EPA, and managing the brownfields information. After being awarded the Assessment Grant, Piqua will

prepare a Work Plan with input from the community (Section 3.a) and secure approval from the EPA. This will mark the official start of the project. After Work Plan approval, Piqua will retain a qualified environmental consultant in compliance with applicable federal procurement regulations. The qualified environmental consultant will assist with grant management operations, perform the assessment work, and assist with required reporting. Additional details on the project team's programmatic capability are provided in Section 2.c.

After a site is deemed eligible by the EPA, the community will be notified and the site will be assessed through performance of a Phase I Environmental Site Assessment (ESA) and/or a Phase II ESA. Phase I ESAs will be conducted according to the requirements of All Appropriate Inquiry (ASTM Standard E1527-05) and, where appropriate, the Ohio Voluntary Action Program (VAP). The environmental consultant will design a Phase II ESA conforming with ASTM Standard E1903-97 and, where appropriate, the Ohio VAP to investigate areas of potential environmental impact. Site Assessment procedures will be instituted to ensure that the community is protected from contaminants during assessment work (Section 4.a). Upon receipt of assessment results, the environmental consultant will work with the City, potential developer, and community partners to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health of residents and the environment. After completion of initial assessment activities, additional safe use or remedial investigations may be needed to further define the extent of contamination and design environmental response actions for cleanup and safe future use of the site. Contaminated sites may be entered into Ohio's Brownfields Program (OBP). The results of assessments will be disseminated to the community through public meetings and notification of community organizations (Sections 3.a -3.c). If health threats are identified, the Ohio Environmental Protection Agency (OEPA) and Miami County Public Health Department (MCPHD) will be notified (Section 3.b). Piqua will also pursue enforcement action against site owners violating City property maintenance ordinances. If needed, the City will seek additional funding from local and state sources and/or the EPA (Section 2.b.iii) for assessment activities and subsequent environmental response activities.

Assessment Grant funds will allow Piqua to begin addressing the brownfields that limit redevelopment options, negatively impact sensitive populations and the environment, and tarnish its image. By completing this project, Piqua will expand its framework for an effective brownfields program, provide incentives for businesses and residents to invest in the community, and achieve the Comprehensive Plan's redevelopment objectives.

b. Budget for EPA Funding, Tracking and Measuring Progress, and Leveraging Other Resources

i) Budget

Hazardous Substances Assessment Grant					
Budget Categories	Task 1: Programmatic Costs	Task 2: Community Outreach	Task 3: Phase I&II Assessments	Task 4: Cleanup and Reuse Planning	Total
Personnel	In Kind	In Kind			
Travel	\$1,500	\$1,500			\$3,000
Supplies		\$1,500			\$1,500
Contractual		\$3,000	\$165,000	\$27,500	\$195,500
Sub-Total	\$1,500	\$6,000	\$165,000	\$27,500	\$200,000
Petroleum Assessment Grant					
Budget Categories	Task 1: Programmatic Costs	Task 2: Community Outreach	Task 3: Phase I&II Assessments	Task 4: Cleanup and Reuse Planning	Total
Personnel	In Kind	In Kind			
Travel	\$1,500	\$1,500			\$3,000



Supplies		\$1,500			\$1,500
Contractual		\$3,000	\$174,000	\$18,500	\$195,500
Sub-Total	\$1,500	\$6,000	\$174,000	\$18,500	\$200,000
TOTALS	\$3,000	\$12,000	\$339,000	\$39,000	\$400,000

No grant funds will be used for administrative tasks. Staff salaries, equipment and most supplies will be paid for with existing City funds, as in-kind services. Task details are presented below.

Task 1: Programmatic Costs - Programmatic costs include attendance of two people at two EPA Brownfields conferences and one other brownfields training program (\$500 per person per trip). The City will provide in-kind staff resources equivalent to the remaining programmatic costs (approximately \$5,000 to \$8,000).

Task 2: Community Outreach - Community outreach costs of approximately \$12,000 will include travel (\$3,000), supplies (\$3,000), and contractual costs (\$6,000) for coordinating and conducting community outreach programs / meetings and travel to community outreach events. The City and the retained consultant will also provide in-kind staff labor, estimated to be valued at \$7,000 to \$10,000, to conduct outreach meetings, draft press releases, update the City website, Facebook page, and LinkedIn page, and other activities to complete community outreach programs.

Task 3: Phase I and II Site Assessments - Sites will be evaluated through performance of Phase I and/or II ESAs (conducted in accordance with All Appropriate Inquiry ASTM Standard E1527-05) and other ASTM standards and practices, and the Ohio VAP. The City anticipates focusing assessment funds on determining the nature and extent of the contamination at the priority sites. The costs for completing Phase I and Phase II ESAs will vary depending on the complexity and whether VAP compliance is required. Based on extensive brownfield experience, Piqua estimates Phase I ESAs will cost \$3,000 to \$6,000, VAP Phase I Property Assessments will cost \$7,000 to \$9,000, and Phase II ESAs will cost \$20,000 to \$50,000. The hazardous substances budget includes contractual costs of \$165,000 based on conducting five Phase I ESAs at an average cost of \$5,000 (\$25,000 total), and four Phase II ESAs at an average cost of \$35,000 each (\$140,000 total). The petroleum budget includes contractual costs of \$174,000, based on six Phase I ESAs at an average cost of \$4,000 (\$24,000 total) and six Phase II ESAs at an average cost of \$25,000 (\$150,000 total).

Task 4: Cleanup Planning - The City will conduct cleanup/redevelopment planning in accordance the OEPA or Bureau of Underground Storage Tank Regulations (BUSTR) programs where redevelopment is imminent. This may include preparation of cleanup plans, assessment of cleanup/redevelopment alternatives, and evaluation of institutional and engineering controls. Contractual costs for this task are estimated at \$27,500 (hazardous substances) and \$18,500 (petroleum), based on completing cleanup and reuse planning at three hazardous substances sites and two petroleum sites. Cleanup Plans are often critical to determine the cost of redevelopment and project viability.

ii) Tracking and Measuring Progress Piqua's goals for its brownfields program, to reduce environmental threats to the community, improve economic conditions, protect the Great Miami River, and protect the environment, support the objectives of their Comprehensive Plan. The City will orient these goals to match the EPA's expected outcomes, which include creating new jobs and greenspaces, and leveraging additional funding through the reuse of brownfields. First, Piqua will evaluate Project achievements against those incorporated into the grant application and Work Plan. Second, Piqua will determine if the Project has resulted in an improved functioning of the brownfield redevelopment process (i.e., successful management, acquisition, and leveraging of brownfield financial incentives). Third, Piqua will report the outcomes and



outputs of the Assessment Grant project in quarterly and annual reports to the EPA and track the following outcomes and outputs on a regularly-updated project spreadsheet:

Outcomes

- Number of sites assessed
- Number of sites identified with off-site risks
- Number of response actions at identified sites
- Number of title transfers facilitated
- Number of sites redeveloped
- Redevelopment investment value
- New jobs and tax revenue generated
- Acres of parks and green space created/preserved

Outputs

- Number of Phase I ESAs
- Number of Phase II ESAs completed
- Number of sites where cleanup planning was conducted
- Number of community outreach events held

iii) Leveraging Assessment Grants can be vital for catalyzing brownfields redevelopment projects because they cover the costs of site assessments needed to support liability management, project design, and remediation planning. This alone is rarely sufficient to ensure a successful redevelopment, which is why Piqua will leverage the following state and federal grants to maximize the benefits of the Assessment Grant.

Piqua is the recipient of one of only six ODOD Brownfield Action Plan Program grants, which combines brownfield redevelopment with community planning. Piqua will receive technical assistance from ODOD to help create their Action Plan, and subsequently receive a \$50,000 grant to help implement the Action Plan. The City has targeted the 26-acre Riverfront District as its Brownfield Action Plan Area.

Piqua is also the recent recipient of a \$148,000 grant from the US Center for Disease Control (CDC) to develop a community health and site reuse plan that will improve public health through redevelopment of brownfields along the Great Miami River corridor, with emphasis on the Riverfront District and adjoining Southview neighborhood. Piqua will partner with the National Brownfield Association to identify and prevent health-related ailments due to the close proximity of brownfields and promote disease prevention and healthy lifestyles.

Piqua will leverage this state and federal funding along with EPA Assessment Grant funding to directly benefit assessment, cleanup, and redevelopment efforts in an area of the City that is 1) most impacted with abandoned brownfields, 2) home to the City's most impoverished residents, and 3) along the Great Miami River. Local resources that can be readily accessed to support assessment and subsequent cleanup and redevelopment activities are presented in the following table; support letters are attached.

<u>Source</u>	<u>Resources Leveraged/Role of Resources</u>	<u>Estimated Value</u>	<u>Likelihood</u>
City of Piqua	1) Meeting rooms, educational materials, and staff needed for press releases, meetings/hearings, website updates, maintenance of Facebook /LinkedIn to support community outreach. 2) Staff to document site selection process, community involvement, and program progress and oversee grant financial transactions to support	\$25,000 for outreach/site selection(500 hrs at \$50/hr) \$10,000 for site access (equipment/staff costs of \$1,000 per day, total of ten days for	100% City will require the in-kind resources

<u>Source</u>	<u>Resources Leveraged/Role of Resources</u>	<u>Estimated Value</u>	<u>Likelihood</u>
	programmatic activities. 3) Site access support (clearing of brush and debris, building access, etc.) to support Phase I and II ESA activities.	grant project)	
Environmental Consultant	Required documentation/reporting including: monthly grant status reports, Quality Assurance Project Plan, Health and Safety Plans, and attendance at project administrative meetings.	\$10,000 (100 hrs at \$100/hr)	100% Consultant required to provide in-kind resources
Upper Valley Career Center	Development and implementation of jobs training course so that local residents can learn skills needed to secure employment in the environmental field and those jobs which will be created through brownfield redevelopment.	Depends on number of students and jobs created	100% UVCC's mission is to create jobs training programs

The following existing local, state and federal resources are also available by application and may be used following expenditure of grant funds:

- Piqua's Job Creation Rapid Outreach Grant Program – grant funding to businesses providing high-wage jobs. Funding can be used for infrastructure, roadway construction and other project-related costs.
- Piqua's Microenterprise Development Revolving Loan Fund (RLF) – loans for businesses locating or expanding within the City.
- JobsOhio Program – Grants for assessment/cleanup/remediation activities.
- OEPA Brownfield RLF – loans for cleanup/remediation activities.
- Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) Grants – additional Assessment Grants (up to \$1 million per grant), cleanup (\$200,000 per grantee-owned site), and RLF (up to \$1 million).

c. Programmatic Capability and Past Performance

i) Programmatic Capability: Piqua is ready to implement an Assessment Grant, and, if awarded will seek approval to begin community outreach activities prior to Cooperative Agreement (CA) approval. The City will dedicate and maintain a grant management team during the entire grant period. Piqua's Department of Development (DOD) will manage the grant and report to the EPA. The Department has a competent staff that understands procedures and requirements associated with both federal, and non-federal, financial assistance agreements.

Mr. William Lutz, Piqua's Development Program Manager, will be the Project Director. Mr. Lutz has been in his current position for six years and has ten years of governmental administration experience, including administering foundation grants as well as ODNR, ODOD, and US Department of Agriculture grants and HUD's CDBG Small City funds. Mr. Lutz has also managed brownfield assessment and cleanup grants received by the City through the Clean Ohio programs. He has a Bachelor of Science degree in Urban Affairs and a Masters degree in Public Administration from Wright State University in Dayton, Ohio.



The City's plan for management continuity in the event of personnel change relies on an experienced and readily available project manager on City staff and an experienced environmental consultant. Mr. Chris Schmiesing, Piqua City Planner, will help coordinate the grant. Mr. Schmiesing can immediately step in as Project Director if needed. Mr. Schmiesing has been with the City since 1991 and has designed and administered numerous public works improvement projects. He has been City Planner since 2004 and administers permitting and regulatory requirements related to site development and redevelopment projects. Mr. Schmiesing has a degree in Civil Engineering from Edison Community College in Piqua.

Piqua will retain a highly competent environmental consultant(s) to conduct the environmental assessments and assist with project tracking. The environmental consultant(s) will be retained using a Qualifications-Based Selection Process that complies with federal procurement regulations (40 CFR §31.36). The selected consultant(s) will be experienced in all aspects of EPA Assessment Grant management and have extensive experience with, and understanding of, the Ohio VAP. The consultant will also have extensive experience with leveraging various brownfield redevelopment incentives (e.g., EPA grants, state grants or loans, and tax credits).

Piqua will use its knowledge, past experiences, and successes with federal and non-federal assistance agreements to effectively manage the Assessment Grant. The City's financial management team is qualified to undertake Assessment Grant management, including the completion and submittal of a Cooperative Agreement and Work Plan; enrollment in the Automated Standard Application for Payments system; and submittal of progress reports to the EPA Project Officer, specifying assessment tasks completed, financial tracking, and proposed grant activities.

ii) Adverse Audits: Piqua has had no adverse audit findings in the last five years. The City has not received adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector or similar organization.

iii) Past Performance: Piqua has not been a previous recipient of a Brownfields cooperative agreement; however the City has successfully obtained and managed other federal and non-federal assistance agreements. Piqua has extensive experience managing federal and non-federal assistance agreements, examples of which are summarized below.

Piqua leveraged over \$20 million from over thirteen federal, state, and local sources to assess, cleanup, and restore the former Fort Piqua Hotel. Over \$3 million in historic tax credits and nearly \$4 million in new market tax credits were issued by the federal government. The State of Ohio provided \$2.26 million in Clean Ohio grants to assess and cleanup the site. Significantly, Piqua residents formed a committee that raised over \$3 million to help restore the City's landmark building. Today, the restored gem in downtown Piqua is known as Fort Piqua Plaza and houses the City's public library, a community banquet facility, and restaurants.

From 2010 to 2012, the City also managed a \$200,000 Clean Ohio Assistance Fund (COAF) Grant and a \$2 million Clean Ohio Remediation Fund (CORF) Grant. COAF funding was used to conduct a Phase II ESA at the abandoned Piqua Memorial Hospital. CORF funding was used to remove asbestos and universal wastes and demolish existing buildings in preparation for redevelopment of the site.

Since 2006, the City has leveraged over \$3 million in grant funds through the Community Development Block Grant (CDBG) program for multiple existing economic development projects.

Piqua has continually met reporting requirements, which consisted of submitting quarterly and semi-annual reports detailing funds that were spent, reporting the progress of the projects, and detailing the benefits and job creation of each project. Piqua has the procedural knowledge to successfully disburse Assessment Grant funds and track Assessment Grant expenditures.



3. Community Engagement and Partnerships

a. Community Involvement: Piqua has a strong partnership with community groups throughout the City. The City will formalize this partnership through formation of the Redevelopment Advisory Committee (RAC). RAC members will include Piqua's four neighborhood associations, the Piqua Area Chamber of Commerce, Grow Piqua Now, and Protect Our Water Ways (POWW). RAC will meet at least quarterly; in addition, RAC members will attend public meetings to educate City residents about Assessment Grant progress.

Following notice of an Assessment Grant award by the EPA, the City will announce the award through a press release to the local newspaper, the Piqua Daily Call, and by posting a notice to the City's website, Facebook page, and LinkedIn page. The City will also place advertisements on local radio stations (WPTW-1570 AM) and Piqua Channel 5, which is the Piqua Public Access Television Station, to reach residents at every educational level and those without internet service. An internet-based nomination and selection process based on reuse possibilities, ease of site access, and other benchmarks will be implemented. Less than 0.7% of Piqua's residents are Hispanic (*U.S. Census*) so no translation services should be needed. If the City learns of specific language or disability needs, it will provide the required support.

The primary post-award community input program will be focused on the Work Plan and final budget, which will be posted on Piqua's website. Hard copies will be made available at City Hall and Public Library to ensure access for those without appropriate information technology availability, knowledge, or experience. Document availability and solicitation of comments will be announced to the public via the City's website and social media sites, the media outlets discussed above, and notifications to key community groups identified above. The City actively collaborates with neighborhood residents, businesses, agencies, and potential developers as the Comprehensive Plan is implemented and updated. Piqua will continue this collaboration throughout the Assessment Grant project. The public will also be able to provide comments verbally to Piqua staff, electronically on Facebook/LinkedIn, and in writing via email or letters. The draft Work Plan will be modified as appropriate in response to relevant comments, and all comments and respective responses will be summarized in the final Work Plan.

Following approval of the Work Plan, Piqua will seek public input regarding the brownfields inventory at an initial kick-off meeting, following notification using the above described procedures, to acquaint community leaders, lenders, developers, citizen groups, and other stakeholders with the goals and operational principles of the project. Meetings will be held at City offices, schools, and libraries. The City will solicit nominations for the brownfields inventory, site prioritization criteria, as well as request information about interested developers and/or redevelopment goals. Piqua will incorporate appropriate sites nominated by citizens and community organizations into the brownfields inventory and determine site prioritization criteria. Subsequent public meetings will be held if additional information regarding the brownfields project is requested by citizens or community organizations.

Following completion of an assessment, local stakeholders will be notified about assessment activities that have occurred, providing results of the assessments, and explaining health and environmental impacts. Assessment results will be posted on Piqua's website, Facebook and LinkedIn. If health threats are identified, the City will send written notices to impacted citizens and contact the Miami County Public Health Department (MCPHD) (Section 3.b). When cleanup and/or redevelopment planning is initiated for a site, more intensive involvement activities will be implemented. These efforts will involve collaborating with community members, agencies, and businesses to identify appropriate end uses and create a redevelopment plan for the site.

Piqua is committed to utilizing grant funds to become more fiscally and environmentally sustainable. As applicable, during redevelopment of brownfield sites, Piqua will consult with the



Western Ohio chapter of the U.S. Green Building Council concerning the utilization of sustainable/green building approaches and techniques. At the close of the project, Piqua will hold a final public meeting to notify the community of the project outcomes. The presentation materials and minutes will be archived and placed on the City's website, and the final results will be incorporated into the Comprehensive Plan.

b. Local, State, and Federal Partnerships: Piqua will capitalize on existing partnerships with local and state environmental/health agencies to ensure the project is successful. The MCPHD is active in education/notification, septic system testing and monitoring, lead poisoning testing, and groundwater protection. MCPHD will continue its involvement in Piqua's CDC grant funded program to develop a community health and site reuse plan that will improve public health through redevelopment of brownfield sites along the Great Miami River corridor, with emphasis on the Riverfront District and adjoining Southview neighborhood.

MCPHD will help identify/verify off-site health threats; identify related toxicological issues; perform risk evaluations with assistance from the Agency for Toxic Substances and Disease Registry (ATSDR), as needed; design and conduct notification/education programs; and coordinate health testing (e.g. free blood tests for children or elderly citizens near sites, such as a foundry or automotive repair facility, where lead contamination may be present) if contaminant migration from a brownfield is confirmed.

Piqua has a strong and productive partnership with the OEPA, Ohio Department of Development (ODOD), Ohio Department of Transportation (ODOT), Ohio Department of Agriculture, and local educational institutions such as Edison Community College and the Upper Valley Career Center. Piqua has already partnered with OEPA and ODOD to successfully assess, cleanup and redevelop the Fort Piqua plaza site, the former City Power Plant, and the former Piqua Memorial Hospital (Section 2.c.iii). Assessment of sites that qualify for Ohio's Voluntary Action Program (VAP) will be conducted in compliance with the rules and guidance documents promulgated by the OEPA.

When contamination is discovered on brownfields, the cleanup criteria established by the OEPA under the Ohio VAP will be used to identify and address on-site health and environmental threats posed by the contamination. If contamination discovered through assessment of brownfields has the potential to negatively impact the health of local populations, especially as related to off-site exposures, the OEPA, Ohio Department of Health, and the MCPHD will be notified and brought in as project partners.

There are no EPA Environmental Workforce Development and Job Training programs currently operating in Piqua or Miami County. However, Upper Valley Career Center (UVCC), as part of its mission to promote workforce development, creates specialized educational programs to provide academic and technical skills for career opportunities. UVCC is discussed in more detail below in Section C.

c. Community-Based Organizations: The list of community organizations that support Piqua's brownfields redevelopment and Comprehensive Plan objectives is too long to include in this application. The following organizations will be key project partners. The organizations' letters of support are attached.

- Grow Piqua Now provides in-depth information about sites available for redevelopment throughout the City. GPN also helps identify available incentives for specific redevelopment projects. GPN will be a key member of the Redevelopment Advisory Committee (RAC) and will provide meeting locations.
- Upper Valley Career Center regularly partners with local economic development teams and businesses to ensure local companies have professionally trained employees. ECC will design and implement an education and training program so Piqua's residents can learn skills needed to secure employment in the environmental field. ECC and the City will provide



local residents with work opportunities and create a strong workforce from which local employers can hire. ECC will also develop future training programs as needed.

- Northparks, Southview, Shawnee, and Southwest Neighborhood Associations were established to help provide for the economic, social, and community development needs of their neighborhoods. The Neighborhood Associations will be members of the City RAC and provide public outreach and community education by including Assessment Grant updates in their newsletters.
- Piqua Area Chamber of Commerce (PACC) is the leading voice for industrial and commercial concerns in Piqua and have strong relationships with both the public and private sectors. PACC will be a member of the RAC and will provide meeting space for RAC and other community outreach events. PACC will also identify developers/business owners to purchase & redevelop brownfields.
- MainStreet Piqua is dedicated to the revitalization, promotion, and redevelopment of Piqua's downtown. MainStreet Piqua will be a member of RAC and provide administrative support to the City.
- Protect Our Waterways (POWW) organizes the annual Great Miami River Clean Sweep, which encompasses 16 miles of the River. In 8 years, POWW volunteers have taken over 125,000 pounds of trash from local waterways. POWW will be a member of the RAC and will design and implement volunteer projects that focus on restoration of Piqua's Riverfront District.

4. Project Benefits Piqua's Comprehensive Plan identifies promotion of commercial and industrial redevelopment in ways that provide a fiscal benefit (i.e., jobs and tax revenue) as a key objective for the future. With an Assessment Grant, the City will be able to incentivize redevelopment of brownfields and lay the foundation for substantial health and welfare, economic, and environmental benefits to City residents.

Availability of Assessment Grant funds will help attract businesses; delineate, and ultimately control, the extent of contamination at brownfield sites; and support redevelopment and reuse of brownfields. Assessment Grant funds will attract businesses to Piqua's Riverfront District and its neighborhoods by reducing environmental due diligence costs; facilitating access to other brownfields redevelopment support, such as the Clean Ohio Fund; and providing needed data for redevelopment planning and safe reuse. Redevelopment will also provide employment, shopping, recreation, and residential opportunities within developed neighborhoods to make them more walkable and accessible to all residents. Finally, the redevelopment of brownfields will allow the City to sustainably reuse its infrastructure and promote conservation of natural resources and expansion of City parks, especially along the Great Miami River.

- a. **Welfare and/or Public Health** Specific health and welfare benefits associated with the priority sites are summarized in the following table.

Priority Site	Potential Health and Welfare Benefits
Former Miller Meteor Hearse and ambulance manufacturing 5-acre site in Southview Neighborhood	Hazardous building materials (i.e., asbestos and lead-based paint) will be identified and abated. Impacted soil and groundwater will be identified and remediated to limit vapor intrusion and inhalation concerns for nearby residents. The sites will be redeveloped as a mixed use retail/commercial district. Amenities and jobs will be created for nearby underemployed/unemployed residents.
Former Automotive Garage and Repair	Hazardous building materials (i.e., asbestos and lead-based paint) will be identified and abated. Waste/junk materials will be removed and recycled as applicable. Impacted soil and groundwater will be



Priority Site	Potential Health and Welfare Benefits
Shop <i>Auto repair</i> 0.5-acre site in the Riverfront District	identified and remediated to limit vapor intrusion and inhalation concerns for nearby residents. The sites will be redeveloped as a mixed use retail/commercial district. Amenities and jobs will be created for nearby underemployed/unemployed residents.
Former Piqua Milling Company <i>Grain and feed processing</i> City block in the Riverfront District	Hazardous building materials (i.e., asbestos and lead-based paint) will be identified and abated. Waste/junk materials will be removed and recycled as applicable. The extent of impacted soil and groundwater will be identified and cleaned up to address direct contact and ingestion concerns for low-income residents. If needed, an exposure barrier will be constructed to allow safe redevelopment of the site as a City park.
Former Piqua Power Plant <i>Electricity generation</i> 0.5-acre site in the Riverfront District	Hazardous building materials (i.e., asbestos and lead-based paint) will be identified and abated. Waste/junk materials will be removed and recycled as applicable. The extent of impacted soil and groundwater will be identified and cleaned up to address direct contact and ingestion concerns for low-income residents. Redevelopment efforts will focus on making a public space that can be enjoyed by residents and visitors to the community given the site's strategic location linking the Riverfront District and the city's downtown.
Former Dry Cleaners Located between the Weaver's and Piqua Granite sites in the Riverfront District	Site history will be determined. Impacted soil and groundwater will be identified and remediated to limit vapor intrusion and inhalation concerns for nearby residents.
Abandoned Gas Stations Located throughout City	Site histories will be determined. Presence of underground storage tanks (USTs) will be determined. Impacted soil and groundwater will be identified and remediated to limit vapor intrusion and inhalation concerns for nearby residents.

Because these sites are located in or directly adjoin the Southview Neighborhood, reductions in health and welfare threats will be directly beneficial to the disproportionately affected, underprivileged residents, helping to address the environmental justice issues these sites present. Cleanup and redevelopment of these sites will greatly reduce current threats to citizens living, working, shopping, learning, and playing in those areas. Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents. These redevelopment outcomes coincide with the guiding Livability Principles¹ of increasing economic competitiveness, leveraging federal investment, and valuing and supporting the community and its neighborhoods.

Assessment Grant operating procedures will ensure that the community is protected from contaminants during assessment work. The public will be notified that the assessment work will be happening. A Health and Safety Plan (HASP) will be completed for each site where intrusive sampling will occur, and access to the site will be controlled with fencing and signage during assessment operations. As specified in the HASP, when subsurface samples are collected or hazardous building materials are disturbed, the release of particulates and vapors will be

¹ Principles adopted by the partnership between the EPA, United States Department of Transportation, and United States Department of Housing and Urban Development to promote smart growth.



monitored and controlled. Decontamination water and purge water generated during groundwater sampling activities will be containerized on-site and appropriately disposed. The assessment data generated will be used to help the City and/or a developer determine how to protect the community during redevelopment activities.

The redevelopment of the priority brownfields, in conjunction with planned area stormwater management practices (Section 4.c) will also limit uncontrolled nonpoint pollution sources and illicit discharges and improve water and sediment quality in the Great Miami River. This will reduce contaminants in the River, improving aquatic life and allowing for fishing and additional recreational opportunities.

b. Economic Benefits and/or Greenspace Redevelopment of brownfields in Piqua will result in economic benefits for residents through creation of job opportunities, improvement in economic activity, and improvement of the tax base. The resulting compact, walkable, urban neighborhoods will hold their value better than suburban sprawl development, encourage local business development, and maintain historic characteristics of the neighborhoods. Brownfields redevelopment will also result in preservation and expansion of Piqua's parks and green spaces along the Great Miami River.

i) Economic Benefits The biggest economic benefits of brownfields redevelopment will be increased jobs, economic activity, and tax revenues, supporting key objectives of Piqua's Comprehensive Plan. Residents in the Southview Neighborhood and throughout the City will once again have access to nearby jobs and retail services. Redevelopment of manufacturing sites for commercial and/or manufacturing reuse is a high priority. Piqua's goal is to replace as many of the previously lost, higher wage jobs as possible for City residents. This will be accomplished by attracting new businesses to defunct manufacturing sites. Assessment Grant funds will help new businesses offset the higher costs of environmental due diligence, site cleanup and redevelopment planning, and exposure controls to add incentives to converting the City's existing brownfields into new homes for their companies.

Many times, redevelopment/reuse of smaller retail/commercial sites can be nearly as important as redevelopment of larger sites. These sites typically lie in downtown neighborhoods where losses of retail or commercial businesses have smaller, more intimate, but significant, impacts (contamination and derelict buildings with lead paint and asbestos) on neighborhoods. Piqua's Comprehensive Plan points to the redevelopment of these sites as integral to the City's revitalization. Direct economic impacts include the loss of jobs and economic activity. Indirect impacts include vacant and decaying buildings that cause blight, emigration of other businesses, and decreased property values. Redevelopment of smaller brownfields in Riverfront District and surrounding neighborhoods with mixed-use commercial/residential redevelopments will create affordable housing with easy access to downtown commercial and retail amenities. This will help maintain the vibrancy of these areas, prevent the generation of new brownfields, improve the tax base, and prevent or reverse these negative economic impacts.

Brownfields redevelopment will also will benefit the community through increased property values and improved image. Redevelopment supported by Assessment Grant funds will attract new businesses to provide desperately needed jobs to a disenfranchised work force and return idle properties to productive, tax generating uses, which will increase property values and revenues to the City. Higher tax revenues will produce another major benefit in the form of strengthened City government operations. Increased tax revenues will allow the City to improve provision of critical services, increase economic development activities, provide additional resources to address more brownfields, and reap the attendant benefits of brownfields redevelopment. These outcomes coincide with the guiding Livability Principles of valuing and supporting community neighborhoods and increasing economic competitiveness.

ii) Greenspace To preserve remaining greenspace, future development must be directed to



previously developed sites. Reuse of previously developed brownfields instead of greenspace also will help reduce sprawl, and protect the natural environments of both the City and surrounding areas. Piqua already has Lock Nine Park and Linear Park along the Riverfront. The City also wants to increase greenspace along the river by creating new City parks that connect to existing riverfront parks. When grant funds are used to conduct assessment activities to support redevelopment, where feasible, the City will require brownfields projects to include greenspace elements in the redevelopment plans and provide for the long-term maintenance and management of greenspace by the future property owners through the site approval process, ordinances, and written agreements. Piqua will also ensure, through the site plan review process, that brownfields redevelopment plans enhance greenspace connectivity and do not interfere with existing or proposed greenspaces, trails, or recreation areas. Brownfield redevelopment projects along the Great Miami River will be encouraged to the extent possible to maintain green spaces, walkways, and/or other public access along the river banks. Promoting greenspace preservation and expansion will provide additional infiltration and filtering for storm water runoff.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse The City's use of the grant to support brownfields redevelopment will provide environmental benefits by minimizing their infrastructure investment associated with those projects. Since Piqua is a landlocked community, infrastructure (water service, sewers, roads, etc.) is widely available. For a City struggling to fund existing costs, minimizing expensive utility line extensions is imperative. This approach will conserve energy and resources by avoiding the extension of new utilities, roads, etc. Many of the vacant commercial/retail buildings are structurally sound and only require remodeling and updating to be ready for productive reuse. The grant will help focus development attention to the existing resources at brownfields. Keeping redevelopments in these areas will allow the City to avoid costly infrastructure investments.

Sustainable development principles including matching land uses to available infrastructure, and protecting natural resources and greenspace are woven into the Comprehensive Plan. The City will consider use of the Leadership in Energy and Environmental Design (LEED) Principles for Neighborhood Design during redevelopment of the priority sites. Assessment Grant funds and other local programs will only be provided for projects where necessary infrastructure exists or can be upgraded at a reasonable cost. By so doing, the City will direct development into areas with existing infrastructure, limiting expenditures on maintenance and utility extensions, reducing the use of construction materials (steel and concrete pipe, fiber optic lines, etc.), and reducing air emissions (greenhouse gases, particulate matter) from construction. The City will be involved in brownfields redevelopments and will encourage/require the use of green site investigation (e.g., in-situ data loggers, direct-push drilling) and remediation techniques (e.g., idling reduction plans for equipment, diesel vehicle retrofit technologies) during brownfields site cleanup and redevelopment. Piqua will encourage incorporating innovative stormwater management techniques (rain gardens, bioswales, etc.), and other sustainable design approaches into brownfields redevelopments such as demolition and construction materials recycling, use of low-volatility building materials, and installation of energy efficient heating/cooling and lighting systems. When existing buildings must be removed, deconstruction, rather than traditional demolition of buildings, will be encouraged.

ATTACHMENT A

Threshold Criteria
and
Letter from State Authority



THRESHOLD CRITERIA FOR ASSESSMENT GRANTS

Applicant Eligibility

The City of Piqua is a general purpose unit of local government in the State of Ohio.

Letter from State Environmental Authority –Letters from the Ohio Environmental Protection Agency (OEPA) and Ohio Bureau of Underground Storage Tank Regulations (BUSTR) are attached.

Site Eligibility and Property Ownership Eligibility

The applicant is requesting a community-wide assessment grant; therefore, site eligibility and property ownership eligibility criteria do not apply.



**Department
of Commerce**

Division of State Fire Marshal
John R. Kesich, Governor
David Goodman, Director

November 8, 2012

Ms. Deborah Orr
U.S. EPA Brownfield Coordinator, Region 5
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3507

Subject: Letter of Support – City of Piqua

Dear Ms. Orr:

This letter acknowledges that the City of Piqua notified the Office of the State Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to apply for a community-wide assessment grant.

Because this is a community-wide assessment grant, BUSTR cannot comment on the regulatory status of any petroleum releases that may or may not be present. BUSTR will review documentation provided by the applicant in an effort to make a property specific eligibility determination for any site identified as potentially eligible for Petroleum Brownfields reimbursement. This eligibility determination includes the following:

- The site is of 'relatively low risk' as compared with other petroleum-only sites in Ohio.
- The site is not being cleaned up using LUST trust fund monies, and is not subject to a response under the Oil Pollution Act.
- There is no viable responsible party liable to clean up the identified release.
- The applicant is a volunteer who is not potentially liable for the petroleum contamination.
- The petroleum-contaminated site is not subject to any order issued under 9003(h) of the Solid Waste Disposal Act.

I support the City of Piqua community-wide grant application subject to these conditions.

Sincerely,

Verne A. Ord
Assistant Chief – BUSTR
Division of State Fire Marshal
Ohio Department of Commerce

cc: Site File
Gary Huff, City of Piqua



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 9, 2012

U.S. Environmental Protection Agency, Region 5
Brownfields and Early Action Section
ATTN: Deborah Orr
77 West Jackson Blvd. (SE-4J)
Chicago, Illinois 60604-3507

RE: The City of Piqua Community-Wide Assessment Grant Proposal

Dear Ms. Orr:

I am pleased to offer Ohio EPA's support for the City of Piqua's Community-Wide Assessment Grant proposal. We have worked with the City of Piqua in the past and hope to be able to provide support to the City of Piqua under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfields Revitalization Act (P.L. 107-118).

The funding the City of Piqua is requesting under their community-wide assessment grant proposal will be used to focus on two brownfields-related health and welfare concerns in the City. The first is the concentration of brownfield sites located near low-income neighborhoods, especially in the Riverfront Mill District and the adjoining Southview neighborhood. The second concern is the migration of contaminants from brownfield sites in the City to the Great Miami River. The City has a preliminary inventory of brownfields and has identified priority sites to evaluate to help address these health and welfare concerns.

We look forward to working with the City of Piqua and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at (614) 644-2924.

Sincerely,

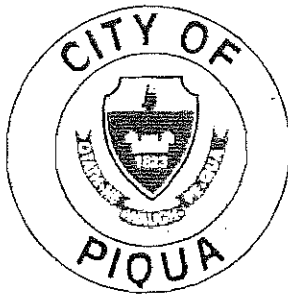
Amy Yersavich, Manager
Ohio Environmental Protection Agency
Site Assistance and Brownfield Revitalization

cc: Mike Starkey, Ohio EPA, DERR/SWDO

ATTACHMENT B

Leveraged Resource Documentation





CITY MANAGER'S OFFICE

Gary A. Huff - City Manager
201 West Water Street • Piqua, Ohio 45356
(937) 778-2051 • FAX (937) 778-2048
E-Mail: ghuff@piquaoh.org

November 14, 2012

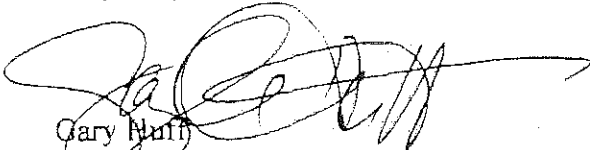
Mr. William Lutz
Development Program Manager
City of Piqua
201 West Water Street
Piqua, OH 45356

Re: Leveraged Local Government Resources for
FY2013 U.S.EPA Brownfields Assessment Grants
City of Piqua, Ohio

Dear Mr. Lutz:

The City of Piqua (the City) is providing this letter as documentation of our commitment to provide in-kind local government staff resources to support implementation of two FY2013 U.S. EPA Brownfields Assessment Grants (\$400,000 for Hazardous Substances and \$200,000 for Petroleum). Specifically, the City will provide up to 500 hours of staff time (includes grant project manager and staff) to support programmatic, community outreach functions and site selection associated with the Assessment Grant Project. These services include preparation of quarterly reports, progress meetings, financial tracking, preparation and distribution of Project information, hosting public meetings, and coordination with U.S. EPA personnel. The value of these in-kind services is approximately \$25,000 (500 hours at an average hourly rate of \$50). In addition the City will provide site access assistance such as clearing brush and debris and building access to support assessment activities. The value of these in-kind services is approximately \$10,000 (10 days at \$1,000 per day).

Very truly yours,



Gary Huff
City Manager
City of Piqua



Nancy D. Luce, Ph.D., Superintendent
Michael Shellabarger, Director, Adult Division

November 9, 2012

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: USEPA Brownfields Assessment Grant

Dear Mr. Lutz:

On behalf of Upper Valley Career Center (UVCC), I am pleased to provide this letter in support of the USEPA Brownfields Assessment Grant application for the City of Piqua, Ohio. This grant will enable the city of Piqua to address important issues that will benefit the community in the areas of economic development and environmental health.

UVCC has been a community partner and educational resource to Piqua and West Central Ohio for more than 37 years. We play a key role in the area economy as we work with economic development partners as well as business and industry to ensure that a skilled and professionally trained workforce is available to meet community employment needs. UVCC collaborates with countless organizations and individuals to design and deliver training programs that lead to jobs for our area residents.

UVCC has enjoyed a lasting and mutually beneficial partnership with civic, business, and governmental leaders in West Central Ohio and Piqua. During the course of the Assessment Grant, UVCC will work with local entities to develop and implement training programs to prepare environmental technician workers. Programs for development would include asbestos-containing materials sample collection, environmental sampling techniques, and health and safety training. Training programs would be designed to provide skilled workers who are prepared to assist with assessment activities in support of Piqua's USEPA Brownfields Assessment Grant.

Respectfully,

A handwritten signature in cursive script that reads "Michael Shellabarger".

Michael Shellabarger
Director, Adult Division
Upper Valley Career Center

ATTACHMENT C

Letters of Support from Community-Based Organizations





November 14, 2012

326 N. Main Street
P.O. Box 1142
Piqua, OH 45356
1 800 251 1742
937.778.0809

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Bill,

Grow Piqua Now (GPN) is the premier public-private partnership dedicated to economic development in Piqua. GPN is pleased to partner with the City of Piqua in the application and administration of the EPA Brownfields Assessment Grant. We believe this funding will address both economic opportunity and environmental justice for our struggling residents and enhance redevelopment opportunities in the City.

GPN will participate in this program in a number of roles. Our primary role will be as a member of the Redevelopment Advisory Committee (RAC). As a RAC member, we will host public meetings and roundtable discussions, encourage participation of private property owners and volunteers in the program, and publish and distribute status updates on the program to the public through newsletters and articles on our website. We will leverage the Assessment Grant funds through identification of developers and providing them assistance on where and how to obtain additional incentives to redevelop our priority sites.

We look forward to being an active member of the RAC, and provide public outreach and advocacy. We will also provide in-kind administrative support, which will include providing meeting spaces for public meetings, throughout the grant period.

GPN is committed to partnering with the City and other stakeholders in their ongoing efforts to address environmental and economic issues in Piqua.

Sincerely,

William Murphy
Executive Director



November 14, 2012

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Bill,

Mainstreet Piqua, Inc. is excited to provide this letter in support of Piqua's EPA Brownfields Assessment Grant. This project will address important economic development, and health and environment issues in the City.

Mainstreet Piqua, Inc. is a non-profit corporation dedicated to the revitalization, promotion and redevelopment of our downtown. Our core mission is to improve the heart of our community.

Mainstreet Piqua, Inc. understands that to be able to prosper and grow as a community, the City must be able to assess, cleanup, and redevelop brownfield sites. The EPA Brownfields Assessment Grant will help Piqua grow the momentum already achieved from other successful brownfield redevelopment projects, such as the restoration of the Fort Piqua Plaza.

We look forward to being an active member of the Redevelopment Advisory Committee (RAC), and provide public outreach and advocacy. We will also provide in-kind administrative support, which will include providing meeting spaces for public meetings, throughout the grant period.

We are committed to partnering with the City and other stakeholders in their ongoing efforts to address environmental and economic issues in Piqua.

Sincerely,

Lorna Swisher
Mainstreet Piqua, Inc.
Executive Director

Northparks Neighborhood Association

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

The Northparks, Southview, Shawnee, and Southwest Neighborhood Associations are happy to partner with the City of Piqua for your EPA Brownfields Assessment Grant program.

Piqua's Neighborhood Associations were formed in 2007 to help provide for the economic, social, and community development needs of our neighborhoods. We are small, volunteer-run organizations that tackle big projects throughout the City.

The City has successfully completed numerous brownfields projects in or near our neighborhoods. These projects have identified and cleaned up impacted soil and groundwater as well as provided opportunities for redevelopment of these abandoned and/or dilapidated sites. The former Piqua Hospital, located in the Northparks Neighborhood and the old City Power Plant, located just south of the Southview Neighborhood are just two recent examples of success stories that resulted from brownfields redevelopment.

We will be members of the City's Redevelopment Advisory Committee (RAC), and provide public outreach and community education for our residents. We hope the EPA will look favorable upon the City's application for funding.

Sincerely,



Russ Fashner
President - Northparks Neighborhood Association



THE PIQUA AREA CHAMBER OF COMMERCE

326 North Main Street • P.O. Box 1142 • Piqua, Ohio 45356

Voice (937) 773-2765 • Fax (937) 773-8553 • Website: www.piquaareachamber.com

November 14, 2012

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

The Piqua Area Chamber of Commerce (the Chamber) is pleased to support the City of Piqua's EPA Brownfields Assessment Grant application. The Chamber is the leading voice for industrial and commercial concerns in the community. We pride ourselves on the strong relationships we have developed with and between the private and public sectors.

The Chamber will be a member of the Redevelopment Advisory Committee (RAC). As a RAC member, we will host public meetings and roundtable discussions and provide in-kind administrative support to the City. We will identify 1) potential target sites to receive Assessment Grant funding; and, 2) developers and/or business owners to purchase and redevelop sites.

With Piqua's experienced brownfields assessment and redevelopment team, the City has tremendous potential to take advantage of continually-improving economic development infrastructure within its borders.

We strongly urge the EPA to fund this grant application for the benefit of the City of Piqua, Miami County, and the greater region.

Sincerely,

Kathy Sherman
President

Piqua Neighborhood Improvement, Inc.

Al Cooper, President Chuck Peltier, Vice President William Lutz, Secretary-Treasurer
201 West Water Street
Piqua, OH 45356

November 14, 2012

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

Piqua Neighborhood Improvement, Incorporated is happy to partner with the City of Piqua for your EPA Brownfields Assessment Grant program.

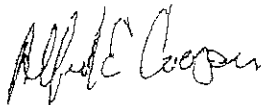
Piqua Neighborhood Improvement, Incorporated was established in 2009 to help coordinate activities between neighborhood associations within our community. We are small, volunteer-run organizations that tackle big projects throughout the City.

The City has successfully completed numerous brownfields projects in or near our neighborhoods. These projects have identified and cleaned up impacted soil and groundwater as well as provided opportunities for redevelopment of these abandoned and/or dilapidated sites. The former Piqua Hospital, located in the Northparks Neighborhood and the old City Power Plant, located just south of the Southview Neighborhood are just two recent examples of success stories that resulted from brownfields redevelopment.

We will be members of the City's Redevelopment Advisory Committee (RAC), and provide public outreach and community education for our residents. We hope the EPA will look favorable upon the City's application for funding.

Sincerely,

Al Cooper
President



Shawnee Neighborhood Association

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

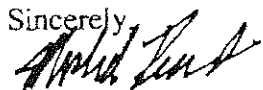
The Northparks, Southview, Shawnee, and Southwest Neighborhood Associations are happy to partner with the City of Piqua for your EPA Brownfields Assessment Grant program.

Piqua's Neighborhood Associations were formed in 2007 to help provide for the economic, social, and community development needs of our neighborhoods. We are small, volunteer-run organizations that tackle big projects throughout the City.

The City has successfully completed numerous brownfields projects in or near our neighborhoods. These projects have identified and cleaned up impacted soil and groundwater as well as provided opportunities for redevelopment of these abandoned and/or dilapidated sites. The former Piqua Hospital, located in the Northparks Neighborhood and the old City Power Plant, located just south of the Southview Neighborhood are just two recent examples of success stories that resulted from brownfields redevelopment.

We will be members of the City's Redevelopment Advisory Committee (RAC), and provide public outreach and community education for our residents. We hope the EPA will look favorable upon the City's application for funding.

Sincerely,



Michael Perando
President - Shawnee Neighborhood Association

Southview Neighborhood Association

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

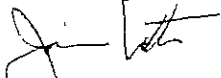
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We will be members of the City's Redevelopment Advisory Committee (RAC), and provide public outreach and community education for our residents. We hope the EPA will look favorable upon the City's application for funding.

Sincerely,



Jim Vetter

President - Southview Neighborhood Association

Southwest Neighborhood Association

Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: Letter of Support for U.S. EPA Brownfields Assessment Grant

Dear Bill,

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We will be members of the City's Redevelopment Advisory Committee (RAC), and provide public outreach and community education for our residents. We hope the EPA will look favorable upon the City's application for funding.

Sincerely,



Earl Wagoner
President - Southwest Neighborhood Association



Nancy D. Luce, Ph.D., Superintendent
Michael Shellabarger, Director, Adult Division

November 9, 2012
Mr. William Lutz
Development Program Manager
City of Piqua
201 W. Water Street
Piqua, Ohio 45356

Re: USEPA Brownfields Assessment Grant

Dear Mr. Lutz:

On behalf of Upper Valley Career Center (UVCC), I am pleased to provide this letter in support of the USEPA Brownfields Assessment Grant application for the City of Piqua, Ohio. This grant will enable the city of Piqua to address important issues that will benefit the community in the areas of economic development and environmental health.

UVCC has been a community partner and educational resource to Piqua and West Central Ohio for more than 37 years. We play a key role in the area economy as we work with economic development partners as well as business and industry to ensure that a skilled and professionally trained workforce is available to meet community employment needs. UVCC collaborates with countless organizations and individuals to design and deliver training programs that lead to jobs for our area residents.

UVCC has enjoyed a lasting and mutually beneficial partnership with civic, business, and governmental leaders in West Central Ohio and Piqua. During the course of the Assessment Grant, UVCC will work with local entities to develop and implement training programs to prepare environmental technician workers. Programs for development would include asbestos-containing materials sample collection, environmental sampling techniques, and health and safety training. Training programs would be designed to provide skilled workers who are prepared to assist with assessment activities in support of Piqua's USEPA Brownfields Assessment Grant.

Respectfully,

A handwritten signature in cursive script that reads "Michael Shellabarger".

Michael Shellabarger
Director, Adult Division
Upper Valley Career Center

ATTACHMENT D

Special Considerations Checklist



Appendix 3 Special Considerations Checklist

Please identify (with an **X**) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. Describe how each consideration applies to your proposal and/or attach documentation.

- ☐ Community population is 10,000 or less
- ☐ Federally recognized Indian tribe
- ☐ United States territory
- ☐ Applicant assisting a Tribe or territory
- ☐ Targeted brownfield sites are impacted by mine-scarred land
- ☐ Targeted brownfield sites are contaminated with controlled substances
- ☐ Community is impacted by recent natural disaster(s) (2005 or later). To be considered, applicant must identify here the timeframe and type of natural disaster.
- ☐ Project is primarily focusing on Phase II assessments
- ☒ Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- ☐ Community experiencing plant closures (or other significant economic disruptions) (2007 or later), including communities experiencing auto plant closures due to bankruptcy or economic disruptions. To be considered, applicant must identify here the timeframe and name of the plant recently closed and jobs lost, or reason for other significant economic disruption.
- ☐ Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, **applicant must attach documentation** which demonstrates this connection to a HUD-DOT-EPA PSC grant.
- ☐ Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant
- ☐ Community is implementing green remediation plans.